GENERAL (%) ELECTRIC

GENERAL ELECTRIC COMPANY..... ELECTRONICS PARK,

SYRACUSE, NEW YORK 13221

ELECTRONIC SYSTEMS RELATIONS AND

UTILITIES

OPERATION

Building 9, Room 101 Electronics Park December 27, 1982

69 10304 E03 108 Pour

Mr. Ernest A. Regna, Chief Solid Waste Branch Environmental Protection Agency Region II, Air & Waste Management Division Solid Waste Branch 26 Federal Plaza New York, New York 10278

Re: Facility Inspection

40 CFR Part 265 Standards

ID #NYD059385120

Dear Mr. Regna:

This is in response to your report of inspection of the referenced facility received October 27, 1982.

The following comments and enclosed exhibits are submitted in reference to the RCRA Inspection Form and to the sections of the regulation for which we have been cited.

40 CFR 265.13(b)

265.13-3(d) - See Exhibit A - Hazardous Waste Management Plan - Section II. A. -Generation, Waste Analysis. Frequency of repeated analysis is annually or more frequently if necessary to ensure that it is accurate and up to date.

- See Exhibit B - All hazardous wastes received from the Court Street and Farrell Road Plants are accompanied by the certification shown.

40 CFR 265.14

265.14 - The Warning Signs have been replaced with signs reading "Danger-Unauthorized Personnel Keep Out".

40 CFR 265.16(d)

265.16 - 1 Thru 3 - See Exhibit C - RCRA Personnel Training Program. This program has been implemented.

continued ...

Mr. Ernest A. Regna, Chief Page 2 12/27/82

40 CFR 265.32

265.32 - An alarm which activates a siren in the facility and a bell in the plant patrol office, which is manned 24 hours a day, every day of the year, has been installed in the container storage area. It can be set off by pulling a lever on the box which is located within the storage facility.

40 CFR 265.35

265.35 - See Exhibit D - A new procedure has been adopted for arranging the drums within the ignitables storage area as shown so that adequate aisle space will be maintained.

40 CFR 265.73

265.73 - See Exhibit E - The operating record has been consolidated into two note-books.

40 CFR 265.112

265.112 - See Exhibit F - Method of clean up has been added to the Plan.

40 CFR 265 - Subpart I

265.I - 2 - Containment system for spills, leaks and precipitation is comprised of the following:

Gutters to

Trench to

Separate Underground Tank

This letter and enclosures constitute confirmation that the violations listed in your letter dated October 25, 1982 have been corrected.

Sincerely yours,

Barry L. Pickard, P.E.

Plant Engineer,

Environmental Systems

BLP/mv

encl.

cc: Thomas Taccone, Permits Admin. Branch

	Subject requirement	40 CFR section Mos.	References	Location in application	Comments	
C-24	Frequency of Analysis	264.13(b)(4)				
	A description of the frequency at which the analyses will be repeated. For an on-site facility this will be whenever there is a process change or as often as required to verify consistency of the waste feed.			,		
C-2e	Additional Requirements for Wastes Generated Offsite	264.13(b)(5) 264.13(c)	40 CFR 261, Appendix I; Ref. 8, Ch. 9.5; Ref. 34, Sec. 4.2.3; Ref. 36,			
	A description of the procedures used to inspect and/or analyze wastes generated offsite that includes procedures to determine their identity and sampling methods used. Also information supplied by generator.		Sec. 4.0; Ref. 39; Ref. 40, Ch. V; Ref. 41, Part 3; Ref. 42, Part III			
C-21	Additional Requirements for Facilities Handling Ignitable, Reactive, or Incom- patible Waste	264 13(h)/6) 264.17		-		
	If the facility stores or treats ignitable, reactive, or incompatible waste, a description of methods which will be used to meet the additional waste analysis requirements necessary for complying with the regulatory requirements for these types of hazardous waste.					
ART D	- PROCESS INFORMATION					
-1 <u>Co</u>	ntainers					
0-1a	Containers with Free Liquids					
0-1	A description of Containers A description of the facility's primary containment devices that includes basic design parameters, dimensions, material of construction, and compatibility of waste with containers. Information submitted should include:	122.25(b)(1)(1)(A) 264.171 264.172	Refs. 90-93		*	
	• Type of container(s) and construction material • Dimensions and useable volume • Liner specifications • Condition of containers • Manufacturer specifications • Determination of compatibility of wastes and containers with description of how compatibility is determined such as trial mixing of waste in containers.	·.				

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Su	bject requirement	40 rf0 section Mos.	References	Location in application	Comments	
	Container Management Practices A description of container management practices Waste containers are always kept closed during storage, except when adding or removing waste. Containers must not be stored in a manner that may cause them to rupture or to leak. Adequately separated for inspection Aisle space Maximum number, height, volume, and types of containers in storage area locations of ignitable, reactive, or incompatible wastes	264. 173	Ref. 90			
D-1 a (3)	 Machinery, equipment and procedures used to move containers Secondary Containment System Design and Operation A description of the design and operation of the container storage area containment systems showing: Design drawing of containment system Capacity of system to hold spills, leaks, precipitation Dimensions 					
D -1a(3	Location of storage areas Liquid collection system and location of sump Description of base grade and slope Description of curbs, dikes, berms, ditches, and trenches (a) Requirement for the Base to Contain Liquids					
	The base under the containers must be free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. The applicant should address: Construction and characteristics of base materials	264. 175(b)(1)	Ref. 90; Ref. 94; Ref. 95			t.
	or base materials Engineering evaluation of base structural integrity Compatibility of base or liner with types of wastes stored					

Subject	requirement	40 CFR section Nos.	References	Location in application	Comments	
D-1a(3)(b)	Containment System Drainage The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids. For this requirement the applicant should address where applicable: **Describe handling and stacking practices** **Grading of base** **Drainage design and removal system so that standing liquid does not remain on base longer than one hour after a leakage or precipitation event.	122.25(b)(1)(1)(B) 264.175(b)(2)	Ref. 90; Ref. 96; Ref. 97			
D-1a(3)(c)	Containment System Capacity The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Information that should be included to satisfy this requirement is:	122.25(b)(1)(1)(C) 264.175(b)(3)	Ref. 90; Refs. 96-98	,		
	 Yolume of largest container Total volume of containers Containment structure capacity Capacity of run-off collection system Geographic storm intensity/frequency data 					
D-1a(3)(d)	Control of Run-on Run-on into the containment system must be prevented, unless the collection system has sufficient excess capacity in addition to that required in the above paragraph to contain any run-on that might enter the system. The applicant should discuss structures used to control run-on such as:	122.25(b)(1)(†)(D) 264.175(b)(4)	Ref. 90; Ref. 94; Ref. 95; Ref. 98			•

Subject requirement	40 CFR section Nos.	References	Location in application	Comments	
Containment system auxiliary structures (curbs, dites, etc.) Engineering grading design Collection and removal system design capacity Potential run-on Demonstration that system has adequate capacity to handle run-on from precipitation event in addition to 10% of the volume of containers or the largest container whichever is greater.		•			
D-la(4) Removal of Liquids from Containment System	122.25(b)(1)(1)(E) 264.175(b)(5)	Ref. 34; Ref. 35; Ref. 90; Ref. 97			
Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner to prevent overflow of the containment system. Information that should be included when describing removal of accumulated liquids is:					
 How liquids will be analyzed Removal equipment and methods (sump pump design, piping specifications, location, discharge point and capacity) Management of accumulated liquid including prevention of overflow 					
1b Containers Without Free Liquids					
D-1b(1) Test for Free Liquids for areas that store containers of wastes that do not contain free liquid the test procedures and results or other documentation or information shoring that the wastes do not contain free liquids.	-	40 CFR 265.314 Federal Register 8311 February 25, 1982			
P-1b(2) <u>Description of Containers</u> A description of the facility primary containment devices that includes basic design parameters, dimensions, materials of construction, and demonstration of compatibility of waste with containers. Information submitte	264. 171 264. 172	Refs. 90-93		,	•

Sc	ubject requirement	40 CFR section Nos.	References	Location in application	Comments	
	Types of container(s) and construction material Dimensions and wseable volume Liner specifications Container condition Manufacturer specifications Determination of compatibility of wastes and container with description of how compatibility is determined such as trial mixing of waste in containers					
D-16(3)	Container Management Practices	264.173	Ref. 90			
	A description of container management practices:					
	 Waste containers are always kept closed during storage except when adding or removing waste Containers are not opened, handled, or stored in a manner that may cause the container to rupture or to leak Adequately separated for inspection Aisle space Maximum number, height, volume, and types of containers in storage area tocation of ignitable, reactive, and incompatible waste 					
D-1b(4)	Container Storage Area Drainage The storage area must be sloped or otherwise designed to drain and remove liquid resulting from precipitation Design drawing showing location of hazardous waste and dimensions Description of stacking practices Base slope Drainage design and removal system	122.25(b)(1)(11)(B) 264.175(c)	Ref. 90; Ref. 96; Ref. 97			
0-2 Tanks						
A reassuor revi pres supp that	ription of Tanks eview of tank design specifications to be that the tanks will not collapse upture. The specifications to be upture. The specifications to be upture include shell strength, capacity, soure controls, foundation, structural port, and seams sufficient to demonstrate tank will not collapse or rupture. ifically the applicant should address items as:	122.25(b)(2) 264.191	Ref. 23; Ref. 24; Ref. 26; Ref. 27; Ref. 28; Ref. 29 Ref. 99			

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	Subject requirement	40 CFR section Nos.	References	tocation in application	Comments	
	• Types and number of tanks • Tank wall thickness • Tank internal pressure and pressure controls • Foundation construction, specifications, and structural supports • Tank design specifications including dimensions, capacity, design, shell thickness, material and method of construction • Tank design standard code and year • Specifications on seams • Operating pressure and temperature • Type of waste contained in tanks • Specific gravity of tank liquids • Maximum height of liquid level					
9-26	Tank Corrosion and Erosion A review of the pertinent characteristics of the tank construction material and lining materials to determine corrosion or erosion effects with wastes and other materials (i.e., treatment reagents). The applicant should also address: Description of lining and coating materials Corrosion allowance and corrosion and erosion rates. Demonstration of how minimum shell thickness will be maintained Tank construction compatibility with waste and tests or documentation to substantiate compatibility Bescription of treatment reagents	122.25(b)(2)(11) 264.192(a)	Ref. 91; Ref. 99			
D-2c	Iank Management Practices A description of the tank owner's or operator's operating practices and controls: Description of controls to prevent overfilling and overtopping such as waste feed cut-off system(s), by-pass or standby tank Demonstration of maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation for uncovered tanks Tank process flow and piping diagrams Description of tank instrumentation such as pressure, temperature, pH, level gauges and monitors Description of safety devices such as rupture discs and safety vents Description of pollution control devices such as vapor recovery systems	122.25(b)(2)(1v) and (v) 264.192(b)	Ref. 99			

TECHNOLOGY FOR THE STORAGE OF HAZARDOUS LIQUIDS

A State-Of-The-Art Review

NEW YORK STATE

DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF WATER BUREAU OF WATER RESOURCES

ALBANY, NEW YORK

JANUARY 1983

1. Pneumatic Testing

Air pressure (pneumatic) tests can be performed when: (1) non-flammable liquids are stored; (2) water or other suitable liquid is unavailable; and (3) water in the tank may contaminate the product stored. Air testing should be avoided if the tank is badly corroded [3]. Low-pressure storage tanks as well as atmospheric tanks can be tested with this method except that low-pressure tanks are tested at slightly higher pressures (i.e. up to

15 psig.), depending upon their design [3].

The primary disadvantage of pneumatic tests is that they are not sensitive enough to detect slow leaks and their precision is limited by the readings of a stick gauge and the amount of product in the tank. Greater accuracy can be achieved, however, when the tank is full or nearly full. Air pressure varies greatly with temperature and also with the vapor pressure of the liquid stored in the tank. Pneumatic tests are extremely hazardous and their use should be discouraged. There has been a fatality from pneumatic testing: a faulty gauge led to overpressurization and explosion of a tank. NFPA 329 states that "pressure tests with air shall not be used on tanks." [8]

Another important drawback of the pneumatic testing method is that large amounts of product may be forced out of the tank during the test without detection. For example, a 6000 gallon tank half-full with product and pressurized to 5 psig with air would lose over 78 gallons of product before a 0.5 psi loss in pressure can be detected. Pneumatic tests are not capable of compensating for thermal expansion or contraction that may mask large leaks. They may even cause a leak by overpressurizing the tank. Air pressure is acceptable for piping tests, however, and it is routinely used at levels of 50 psig with no adverse effects on sound piping systems. OSHA regulations require air pressure testing of submerged transfer pump piping every five years at maximum operating pressure.

2. Hydrostatic (Standpipe) Testing [6]

Hydrostatic tests involve pressurization of a storage system by connecting a standpipe to a completely filled tank. An additional head is placed on the tank by filling the standpipe, generally to an elevation such that a pressure of 5 psi is exerted at the bottom of the tank. A leak is detected by observing a drop of the liquid level in the standpipe. The magnitude of the leak can be determined by measuring this level drop. Hydrostatic tests are more accurate than pneumatic tests, but they still contain several sources of error. The expansion of the tank due to the pressure exerted during the test produces an apparent loss of product. The magnitude of this apparent loss depends on the tank deflection and can be substantial. Table 2.6-2 shows the magnitude of this loss for varying deflections on a given size tank.

The procedure will be useful where it is desired to test an underground storage tank and its connected piping for gross leaks. It is not adequate for detecting slow leaks nor for determining that a tank system is tight.

Often water is substituted for the product stored in the tank. However, water is more viscous than many hazardous substances (gasoline, light oils, etc.), and thus will leak out at a slower rate. This will bias the measurement of the actual leak rate.

Hydrostatic tests do not compensate for thermal expansion or contraction of the test liquid as it exchanges heat with the tank and surrounding soils. If the test liquid is colder than the stored product, it will expand when heated and thereby raise the level in the standpipe. This will also bias the level measurements on which the test is based. For example, if the contents of 6000 gallon tank are warmed 2°F, there will be a 7.2 gallon increase in volume. If the hydrostatic test is run for 2 hours, a leak of almost 90 gal/day will not be detected because no change in liquid level will occur.

In situations where an underground storage tank can be removed from service for several days, a hydrostatic test in which the test liquid is allowed to reach thermal and mechanical equilibrium with the tank can be very sensitive in detecting small leaks. The ability to isolate and test a tank over a period of several days may be likely in an industrial storage situation, whereas it may be impractical in testing gasoline service station tanks. Increased accuracy is available from hydrostatic testing where a long time period can be employed to permit reaching equilibrium conditions.

3. The Heath Petro-Tite Tank and Line Testing Systems (Kent-Moore Test) [15,16]

The Kent-Moore test is essentially a hydrostatic test that compensates for temperature, pressure and viscosity variation. This enables leaks as small as 0.05 gal/ hr to be readily detected. The Kent-Moore test consists of exerting a pressure head on the tank by means of a standpipe filled with the same liquid stored in the tank. This eliminates the error introduced by using a liquid of different viscosity. A pump is used to circulate the liquid in order to produce a uniform temperature throughout the tank. Using a thermal sensor, the temperature changes are precisely measured to account for expansion and contraction of the liquid. The volumetric measurements are then correspondingly adjusted for the changes in temperature. The Kent-Moore test includes a means of accurately measuring all product added or removed from the standpipe in order to maintain a constant head. By comparing the product added or drained with the volumetric changes anticipated due to temperature changes, it is possible to reliably detect a leak as small as 0.05 gal/hr.

For storage systems with submerged pumping, the Kent-Moore test must be run separately on the tank and on the piping to give good results. On suction delivery storage sytems, the Kent-Moore test checks the entire system simultaneously.

The Kent-Moore test requires several hours for completion with accurate results. Generally, during he first few hours of such a test there is a drop in the standpipe level attributed to the tank expanding because of the increase in internal presure. This is compensated for by reducing the tank pressure after 2 hours to control tank expansion. It has been determined by experimentation and field testing that by reducing the tank pressure after 2 hours further tank expansion does not take place. The Kent-Moore test can usually be completed in one working day. However, it is a relatively difficult test which must be performed by a skilled technician.

Because of the extensive shut-down time requirements and the level of skill involved, the Kent-Moore test is relatively expensive to perform.

4. The J-Tube Manomenter Test [15,16]

The J-tube leak detector developed by the Ethyl Corporation and field-tested by Texaco is essentially a manometer-type instrument that is capable of measuring very small drops in product level caused by tank leakage. The J-tube consists of a large diameter leg and a small-diameter leg that cause a magnification of an liquid level change as shown in Figure 2.6-1a. The detector can be placed in a tank through a 3-inch or larger fill-pipe, and the valves can be operated while the detector is in the tank. When placed in the underground tank, the detector primes as shown in Figure 2.6-1c. If the liquid level in the tank drops during the test period. the indicator fluid will be displaced as shown in Figure 2.6-1d. The ratio of the change in the indicator level to the change in the liquid level of the tank is the magnification factor and a measure of the rate of leakage. The lower valve is closed and the reservoir valve is opened just before removing the detector from the tank. This locks the indicator fluid in place while the leak detector is removed from the tank and a reading obtained as shown in Figure 2.6-1e.

The J-tube leak detector will detect leaks that cause variations in tank product level as small as 0.02 inches [7]. For a one-hour test with the product level in the middle of an 8,000 gallon tank, a change of 0.02 inches reflects a leak rate of 2.12 gallons per hour. Accuracy is dependent on the time span of the test. If, in the example above, the time span had been for a period of 10 hours instead of one hour, the leak rate would be 0.212 gallons per hour.

Possible effects of temperature and tank-end deflection variables are reduced by careful adherence to the test procedure. Instructions on the use of the equipment state that 1°F change in product temperature during the test will negate the results. Therefore, tests conducted within 24 hours after delivery should be avoided be-

cause temperature sometimes varies within that period. When the leak test is begun 24 hours or more after a delivery, the temperature usually does not vary 1°F from the beginning to the end of the test.

Also, temperature has been found to be stable at various depths from the top to the bottom of the tank. Rejection of any test with a 1°F temperature change means that error due to temperature is kept within small limits. For example, the error in 4,000 gallons of gasoline would be less than 2.4 gallons, or in 2,000 gallons of gasoline would be less than 1.2 gallons.

Tank-end deflection is not regarded as a serious problem because no unusual pressure is applied to the tank and also because the tank has at least 24 hours to physically stabilize in the ground before the leak test starts.

Advantages of the Texaco J-tube leak detector are:

- It is relatively easy to transport, assemble and operate.
- It does not intensify existing leaks or create new leaks, since no hydraulic or air pressure is used.
- Accuracy is a function of the time span of the test. The euipment will measure major leaks in a short period of time and relatively minor leaks in a longer period of time.
- It does not require a contractor crew to operate and no tank truck delivery is required.
- •Several tanks can be tested simultaneously.
- Underground tank, piping and dispenser openings need not be sealed.

One disadvantage of the J-tube leak detector is that it will not detect leaks above the product level in the storage tank.

While the J-tube leak detector was developed primarily for fuel storage tanks, it can be applied with other liquid products as well.

5. The Sunmark Leak Detection Test [8,9,10]

The Sunmark Industries Leak Lokator is an equipment system capable of detecting and measuring volume changes in underground storage systems. It was principally developed for use on gasoline storage tanks but could be used for other liquid storage systems as well. The equipment is capable of differentiating between piping leaks and tank leaks.

The basic equipment consists of a sensor, an analytical balance, and a chart recorder. The sensor is an open top, hollow tube filled with the liquid contained in the tank. It is suspended from the analytical balance and partially submerged in the tank liquid. As the liquid level in the tank changes, the buoyancy of the sensor also changes. This change of mass displacement measured by the analytical balance is an indication of volume changes within the tank. The chart recorder provides a graphical representation of volume change versus time.

References

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- American Petroleum Institute, Guide for Inspection of Refinery Equipment, Chapter IV - Inspection Tools, American Petroleum Institute, 2101 L Street, N.W., Washington D.C. 20037, Second Ed., 1972.
- American Petroleum Institute, Guide for Inspection of Refinery Equipment, Chapter XIII - Atmospheric and Low-Pressure Storage Tanks, American Petroleum Institute, 2101 L Street, N.W., Washington D.C. 20037, Second Ed., 1973.
- Fitzgerald, J.H., "Corrosion Control for Buried Service Station Tanks," Paper No. 52, The International Corrosion Forum Devoted Exclusively to the Portection and Performance of Materials, April 14-18, 1975, Toronto, Canada, National Association of Corrosion Engineers, Publications Department, 1440 South Creek, Houston, Texas 77084.
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- National Fire Protection Association, Underground Leakage of Flammable and Combustible Liquids, NFPA 329, National Fire Protection Association, Batterymarch Park, Quincy, MA 02269, 1977.
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- Frick, R., Preliminary Review The Sunmark Leak Lokator, New York State Department of Environmental Conservation Memorandum, NYSDEC, 50 Wolf Road, Albany, N.Y. 12233, Aug. 26, 1980.
- Sunmark Industries, The Sunmark Leak Lokator Technical Bulletin, Sunmark Industries, P.O. Box 7368, Philadelphia, PA 19101.

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- National Fire Protection Association, Flammable and Combustible Liquids Code, NFPA 30, National Fire Protection Association, Batterymarch Park, Quincy, MA 02269, 1980.
- 12. Maresca, Jr., J.W., Evans, P.C., Measurement of Small Leaks in Underground Gasoline Storage Tanks Using Laser Interferometry, SRI International, Menlo Park, CA 94025, Oct. 31, 1979.
- Anonymous, "Leak Detection: Still Top Priority," Petroleum Marketer, June 1980.
- McLean, R.F., A Test in Progress Using a Kent-Moore Tank Systems Tightness Tester - Model 1000, paper sponsored by the American Petroleum Institute and presented at the 43rd Annual Fire Department Instructors Conference in Kansas City, MO, March 30-April 2, 1971.
- Heath Consultants, Inc., Procedure Manual for the operation of the Petro Tite Tank Tester, Form #582 HPN 5124, Heath Consultants, Inc., 100 Tosca Drive, Stoughton, MA 02072.
- Heath Consultants, Inc., Procedure Manual for the operation of the Petro Tite Tank Tester, Form #583 HPN 5254, Heath Consultants, Inc., 100 Tosca Drive, Stoughton, MA 02072.
- 17. Ethyl Corp., "Ethyl" Tank Sentry (Underground Tank Leak Detector), Ethyl Corp., Petroleum Chemicals Division, 2 Houston Center, Suite 900, Houston, Texas 77002.
- ARCO Petroleum Products Co., "HTC Service Station Tank Leak Tester", ARCO Petroleum Products Co., Harvey Technical Center, 400 East Sibley Blvd., Harvey, IL 60426.
- National Association of Corrosion Engineers, NACE, 2400 West Loop South, Houston, Texas 77027.

EXHIBIT E

OPERATING RECORD

HAZARDOUS WASTE STORAGE FACILITY

MAIN - SYRACUSE AREA

OPERATING RECORD

HAZARDOUS WASTE STORAGE FACILITY

MAIN - SYRACUSE AREA

TABLE OF CONTENTS

VOLUME I -

SECTION A - MASTER IDENTIFICATION FILE

SECTION B - MASTER WASTE PRODUCT RECORD FORM

SECTION C - WASTE PRODUCT RECORD FORMS (Sample)

VOLUME II -

SECTION A - DAILY OPERATING LOG (Sample)

SECTION B - WEEKLY INSPECTION LOG (Sample)

EXHIBIT A

WASTE ANALYSIS PLAN

Before a hazardous waste can be treated, stored or disposed of, a detailed chemical and physical analysis of a representative sample of the waste must be obtained. The sampling and analysis must be repeated annually or more frequently if necessary to ensure that it is accurate and up to date.

The method of sampling shall be in accordance with Containerized Liquid Wastes Sampling "COLIWASA" as described in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" published by the U.S. Environmental Protection Agency, Office of Solid Waste, a copy of which is included in Appendix I.

The methods of chemical analysis shall be in accordance with Tables 1, 2 and 3 of Appendix I. The specified analytical procedures are described in "Test Methods for Evaluating Solid Waste" (SW-846) published by the U.S. Environmental Protection Agency, Office of Solid Waste, a copy of which is on file with Plant Engineering, Environmental Systems, Building 9, Electronics Park.

The parameters for which each hazardous waste will be analyzed are the following:

- 1. Specific Gravity
- 2. Flash Point
- 3. pH
- 4. Organo-Chlorine
- 5. Sulfur
- 6. Primary Chemical Constituents Percentages of Composition of each

The results of the analysis and toxicity information for each hazardous waste generated shall be reported on the Waste Product Record Form, a copy of which is included in Appendix I. A completed Waste Product Record Form must be presented to Plant Engineering, Environmental Systems, before each hazardous waste will be accepted for storage in the main area storage facility.

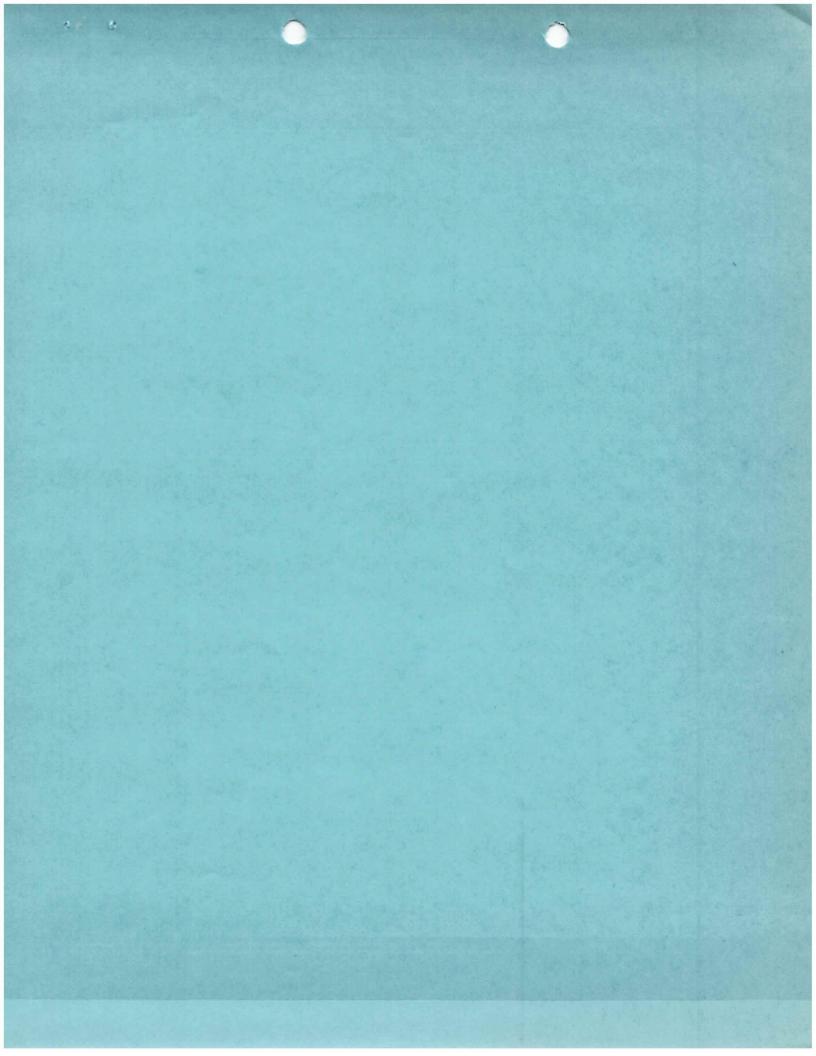


EXHIBIT B

Generator Waste Product Certification

Certification No.	GE Waste Description	Quantity	Weight	Date Labeled	Initials of Persons Responsible for Labeling	Date Transferred
Product I identific to the be willfull	Record descri ed descriptio est of my kno	ption iden n is truel wledge and compositi	tified by repres I ability ons or p	y the G.E entative to deter	insferred conforms to code listed above. and is complete and mine that no deliber exist and that all	The accurate ate or
Date	Title*	s	ignature	Ph	one No.	

^{*}Foreman or Unit Manager.

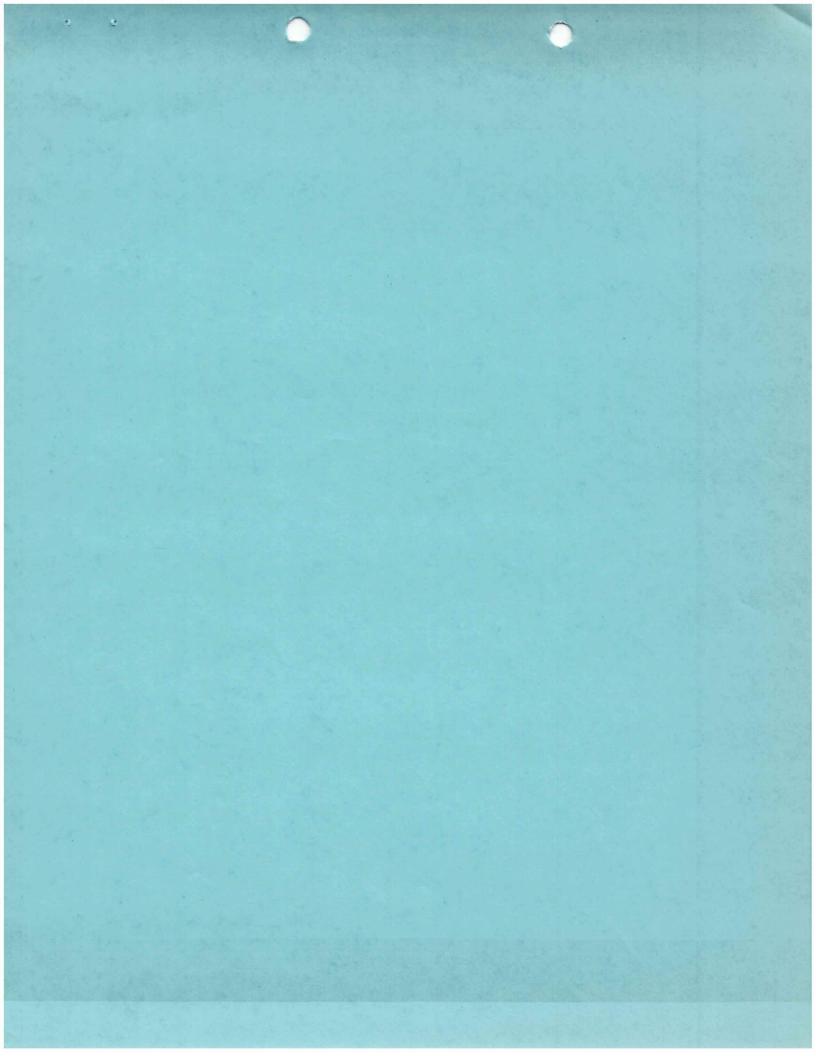


EXHIBIT C

RCRA

PERSONNEL

TRAINING

PROGRAM

	ant-Chemical Waste Euel Oil Facilities	Area Utility Operation	Supersede. Code No.	Job Code 655115
Department	Approved	Analyst	Job Value	Date
ESR&UO	C.B. Quinn	C.B. Quinn	R-15	

Receive all chemical waste from various Syracuse plant operations, see to

PRIMARY FUNCTION proper containerization, segregate wastes per established instructions, make out necessary paper work for logs and transhipment for disposal via designated vendor. Load, unload trucks and operate fork lift truck.

Unload oil from supply trucks as necessary. Monitor gas and oil levels, call appropriate vendors for re-supply when necessary. Check periodically for proper oil, gas, pumping facilities FACILITIES

Gauges, meters, fork lift truck, hand trucks, various racks and containers, miscellaneous hand bench tools, oil transfer pumps.

MATERIALS

Wide variety of acids, solvents, cylinder gases, pallets, crates, cartons, drums, assortment of material control forms, gloves, cleaning materials.

DIRECTION EXERCISED

May occasionally provide work direction to lower-rated employees.

WORKING PROCEDURE

Work from generally prescribed directions, written and oral, use standard tools and equipment.

Load and unload drums and containers onto and from truck at storage facility. Inspect each container for type, condition, identification and proper labelling and accept only those meeting requirements, sign receipt for those accepted at facility and return to generator those which do not meet requirements. Properly segregate and store all received chemicals.

Inspect facility and contents daily to ensure proper storage is maintained and any leaks

are detected. Maintain log of such inspections.

Notify proper supervision when designated number of drums (currently 80) have accumulated for shipment by vendor to disposal site. Load material for disposal shipment. Prepare and maintain all required documentation.

Unload 2-3 loads per day of oil from vendor supply trucks during oil use periods.

Fill liquid nitrogen tanks for Bldgs. 3 & 6.

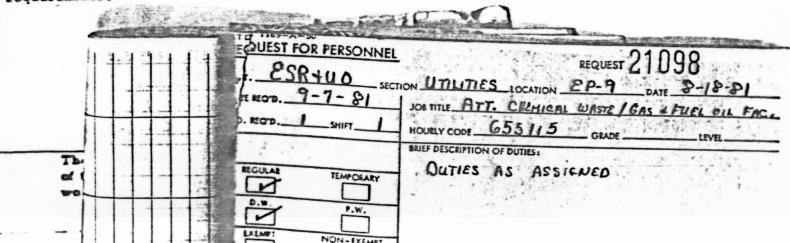
Take periodic quantity readings on oil storage tanks; argon, oxygen, liquid nitrogen, hydrogen tanks, and propane cylinders. Call suppliers as necessary to resupply. Notify patrol of any week-end deliveries. Take natural gas reading used for B/10 boiler.

Check for any abnormal conditions in natural gas house, oil house, propane form; perform

general housekeeping in gas house, switchgear room, and oil house pumping station.

Perform related or miscellaneous duties as assigned (e.g., clean oil strainer).

Keep facilities, materials, and work areas orderly, exercising care in their use and maintaining general good housekeeping practices and conforming to all safety and quality requirements.



RCRA - TRAINING RECORD

Raymond S. Merriett Name

Backup Attendant-Chemical Waste Facility Title

TYPE TRAINING	DATE COMPLETED
OJT - Familiarization with Storage Facilities and Operating Procedures by W. Fasce and D. Houde.	December 13-18, 1981
OJT - Familiarization and Instruction Regarding Recordkeeping by W. Fasce and D. Houde.	December 16-17, 1981
OJT - Familiarization with Labelling and Drum Types Used for Hazardous Waste Handling by W. Fasce and D. Houde.	December 17-18, 1981

	ant-Chemical Waste Suel Oil Facilities	Area Utility Operation	Supersedes Code No.	Job Code 655115
Department	Approved	Analyst	Job Value	Date
ESR&UO	C.B. Quinn	C.B. Quinn	R-15	

Receive all chemical waste from various Syracuse plant operations, see to PRIMARY FUNCTION proper containerization, segregate wastes per established instructions, make out necessary paper work for logs and transhipment for disposal via designated vendor. Load, unload trucks and operate fork lift truck.

Unload oil from supply trucks as necessary. Monitor gas and oil levels, call appropriate vendors for re-supply when necessary. Check periodically for proper oil, gas, pumping facilities FACILITIES

Gauges, meters, fork lift truck, hand trucks, various racks and containers, miscellaneous hand bench tools, oil transfer pumps.

MATERIALS

Wide variety of acids, solvents, cylinder gases, pallets, crates, cartons, drums, assortment of material control forms, gloves, cleaning materials.

DIRECTION EXERCISED

May occasionally provide work direction to lower-rated employees.

WORKING PROCEDURE

Work from generally prescribed directions, written and oral, use standard tools and equipment.

Load and unload drums and containers onto and from truck at storage facility. Inspect each container for type, condition, identification and proper labelling and accept only those meeting requirements, sign receipt for those accepted at facility and return to generator those which do not meet requirements. Properly segregate and store all received chemicals.

Inspect facility and contents daily to ensure proper storage is maintained and any leaks

are detected. Maintain log of such inspections.

Notify proper supervision when designated number of drums (currently 80) have accumulated for shipment by vendor to disposal site. Load material for disposal shipment. Prepare and maintain all required documentation.

Unload 2-3 loads per day of oil from vendor supply trucks during oil use periods.

Fill liquid nitrogen tanks for Bldgs. 3 & 6.

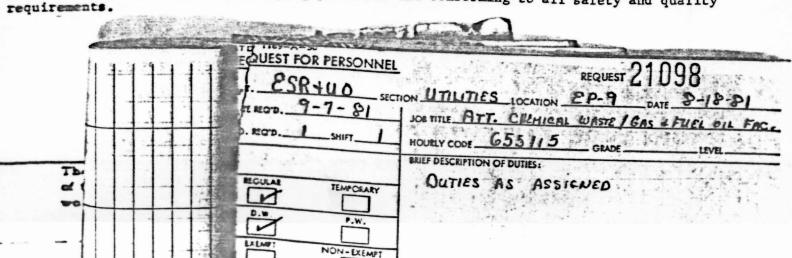
Take periodic quantity readings on oil storage tanks; argon, oxygen, liquid nitrogen, hydrogen tanks, and propane cylinders. Call suppliers as necessary to resupply. Notify patrol of any week-end deliveries. Take natural gas reading used for B/10 boiler.

Check for any abnormal conditions in natural gas house, oil house, propane form; perform

general housekeeping in gas house, switchgear room, and oil house pumping station.

Perform related or miscellaneous duties as assigned (e.g., clean oil strainer).

Keep facilities, materials, and work areas orderly, exercising care in their use and maintaining general good housekeeping practices and conforming to all safety and quality



RCRA - TRAINING RECORD

David J. Houde Name

Attendant-Chemical Waste Facility Title

TYPE TRAINING	DATE COMPLETED
OJT - Familiarization with Storage Facilities and Operating Procedures by W. Fasce and B. Pickard	October 5-9, 1981
OJT - Familiarization with Labelling and Drum Types Used for Hazardous Waste Handling by W. Fasce and B. Pickard.	October 5-30, 1981
Course - Lift Truck Operation by Clark Industrial Truck Division.	October 15, 1981
OJT - Familiarization and Instruction Regarding Recordkeeping by B. Pickard.	October 29-30, 1981
Course - Chemical Safety by ESR&UO Safety Committee.	July 12-15, 1982

DIVIDUAL EXPERIENCE RECORD

NAME	FASCE	William	E. SOCIAL SECURIT	060-16-6923
	(last)	(first)	(initial)	

WORK EXPERIENCE

Begin with first position held. Include military service and work with other companies.

Dates From (mo/yr) To (mo/yr)	Position Level	GE Component, or Other Company and Location Immediate Manager(s)	POSITION TITLE & DESCRIPTION Underline position title; then describe responsibilities and achievements or significant contributions. Indicate products, type of operation and industries involved. Show field or activity or subfunction. If managerial position, show number and types of employees supervised.
1/42-11/45	T.Sgt.	8th A.F.	Gunner to Sgt. Major of Unit & Acctg 1st Sgt.
1/46-3/52		Schaeffer News Agency	Managed wholesale magazine and newspaper distributorship: billing, distribution etc.
3/52-1/55	Gr. 7	Tube Dept., Auburn Warehouse	Shipping Coordinator for all trucks and railroad cars.
1/55-1/60	Gr. 10	Equipment Utilities & Relation R. L. Loesch	Posting, Stock Control, Billing, etc.
/60-11/65	Lv 4	Utilities Operation R. L. Loesch	Supervisor - Letter Shop Duplicating-Advertising Books. Addressograph-
1/65-4/69	Lv 6	Utilities Operation R. L. Loesch	Typing-Overall complete setup of Advertising & Publishing Business.
/69-10/69	Lv 7	Utilities Operation R. L. Loesch	Specialist - Dispose of GE surplus material to highest bidder through sealed bids set up
0/69-12/71	Lv 8	Utilities Operation	sales and complete bids, trash removal various buildings, housekeeping of park.
2/71-Present	Lv 8	Syracuse Relations & Utilities R. L. Loesch D. Lane M. M. Holt	Supervisor-Mail Room-Syracuse Area, Recvg & Shipping, Scrap & Salvage, Trash & Solvent Disposal (Hazardous Waste). Responsible for Main Mail Room with 6 non-exempt employees sorting and distributing mail to all G.E. locations in the Syracuse Area. This includes metering all mail, handling classified material with registered mail records, and billing for special large mailings. Direct 1 hourly employee to receive all materials for Building 1,2,9 and 10 at Electrnics Park. This amounts to approximately 6000 receiving reports and 10,000 items. Counsel Departments in accumulating and handling scrap, salvage and surplus materials to achieve maximum dollareturn. Maintain warehouse facilities as required to accumulate surplus materials to be sold. Initiate bid offerings to insure maximum interest and adequate bidding. Administer and account for trash hauling are proper disposal of hazardous waste materia

Employee's Signature _______ Date ______

RCRA - TRAINING RECORD

William E. Fasce Name

Supervisor-Receiving, Shipping & Salvage Title

TYPE TRAINING	DATE COMPLETED	
Course - Handling of Hazardous Materials (20 Hrs.) by North Syracuse Fire Department.	Jan-April, 1979	
OJT - Familiarization and Instruction Regarding Recordkeeping by B. Pickard.	November, 1980	
OJT - Familiarization with Labelling and Drum Types Used for Hazardous Waste Handling by B. Pickard.	November, 1980	
OJT - Familiarization with Storage Facilities and Operating Procedures by B. Pickard.	January, 1981	
Course - Hazardous Materials Transportation Work-shop by UNZ & Co.	July 15, 1981	
Course - Use of N.Y.S. Hazardous Waste Manifest by N.Y.S. Department of Environmental Conservation (D.E.C.).	April 1, 1982	
Course - N.Y.S. Hazardous Waste Regulations by N.Y.S.D.E.C.	April 12, 1982	
Course - Chemical Safety by ESR&UO Safety Committee.	July 12-15, 1982	

POSITION OPENING SPECIFICATION

			PERSON	NEL REQUEST #	
EADLINE	DATE	POSTING DAT	E	This space for R, M&OP	ıse
rofessi	onal Pract:	N FOR EXEMPT JOB OPE ices (CSP 4-41) must DEADLINE DATE.	NING form to be co receive completed	nsidered for this opening. form and up-to-date CMMD-2	
TITLE	OF POSITION	N:			
		Plant Engineer - E	nvironmental Syste	ems	
REPORT	S TO:	Mgr., Plant Engin	eering & Construct	ion	
	LEVEL 11		NO. OF OPENINGS	NEED BY DATE ASAP	
EDUCAT	ION REQUIRE	p: Technical degree Professional Engi	at Bachelor of Sci neering license (S	ence level. tate of New York)	
SPECIAL	TRAINING	DESIRED: Knowledge			
		to environm	ental requirements		
(2)	policies contacts Recomme Solve pro Design re	& practices. Interfa Communicate inform nd req'd programs. blems, such as - U	ce with all governation & direction Perform audits. Renderstanding and i	water & air. Recommend are mental agencies, EPO & other to Syracuse facilities reps. esponsibility includes EP, FRI nterpretation of Federal Registance. Program to determine sed.	r e & ster
	NCE REQUIR	ED: tivity - Field - Pro	duct)		
	5-10 year	rs in environmental e water, air & solid	engineering field i	nvolving projects	
TRAITS	OR CHARACT	ERISTICS DESIRED:			
	Desire fo	r technical environm people & programs.		mmunicate information & ability with governmental	
COMMENT	Scope of	position interfaces v cs Park, Court Street	with all operating (
SUBMITT	ED BY:		SECTION	DATE	
	R.O. Qui	mby	Utilities & Plant Service	November 6, 1980	

When completed, Forward to:

RCRA - TRAINING RECORD

Barry L. Pickard Name

Plant Engr-Environmental Systems Title

TYPE TRAINING	DATE COMPLETED
OJT - Wrote Area Hazardous Waste Management Plan.	November 10, 1980
OJT - RCRA Audit by M. Phillips, GE Environmental Protection Operation (EPO).	March 19, 1981
Seminar - Environmental Protection by GE EPO.	May 6-8, 1981
Course - Hazardous Materials Transportation Workshop by UNZ &Co.	July 15, 1981
Course - Use of N.Y.S. Hazardous Waste Manifest by N.Y.S. Department of Environmental Conservation (D.E.C.).	April 1, 1982
Course - N.Y.S. Hazardous Waste Regulations by N.Y.S. D.E.C.	April 12, 1982
Course Instructor - Chemical Safety by ESR&UO Safety Committee.	July 12-15, 1982
Seminar - Regulatory Workshop by GE EPO.	November 4, 1982

RCRA PERSONNEL TRAINING PROGRAM

All storage facility personnel must complete a program which teaches them proper operating and emergency procedures to ensure compliance with the Resource Conservation and Recovery Act (RCRA). The program, which must be successfully completed within six months of employment, shall be comprised of the following:

- 1. Familiarization with the Syracuse Area Hazardous Waste Management Plan, particularly the section regarding storage.
- 2. The consequences of not handling hazardous wastes properly.
- Actual operating techniques including:
 - a) Safe drum handling procedures
 - b) Inspection procedures
 - c) Equipment and facility maintenance procedures
- 4. Implementation of the contingency plan including:
 - a) Emergency procedures
 - b) Use of emergency equipment
- 5. Facility closure procedure

Additionally, all facility personnel must take part in an annual review of this training.

Training records shall be kept for at least three years showing the following:

- 1. Name of employee
- 2. Job title and description
- 3. Type of training and dates received
- 4. Description of training given

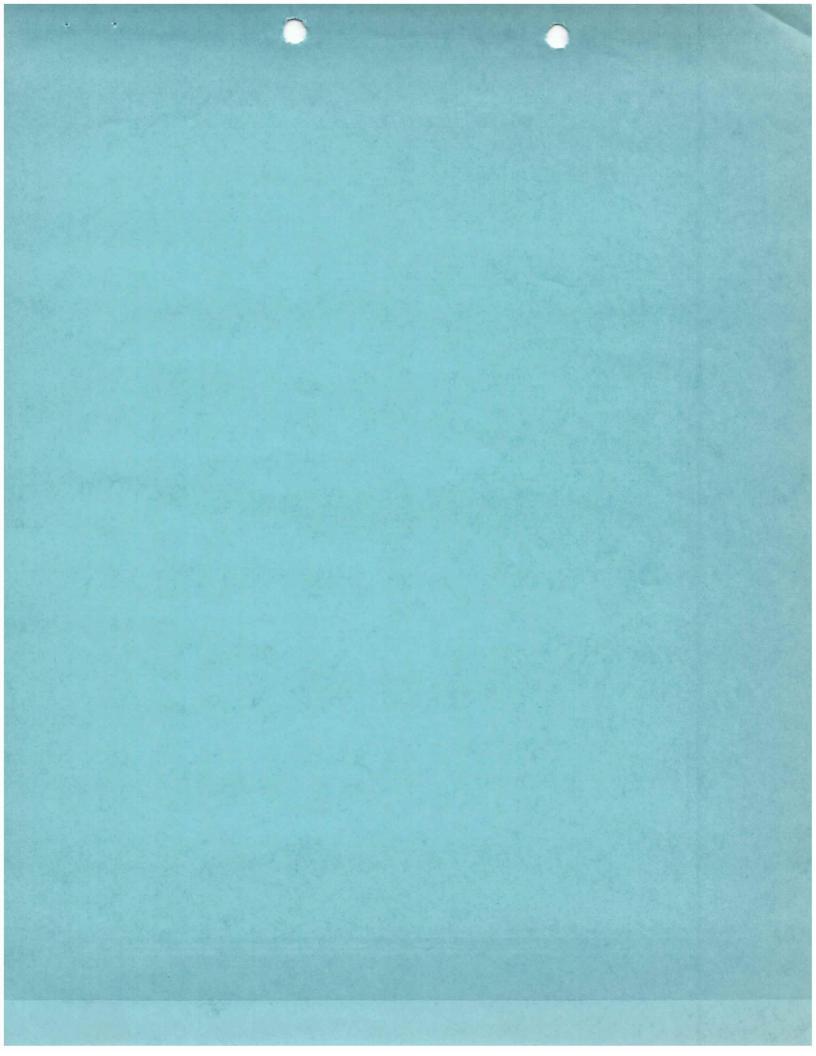
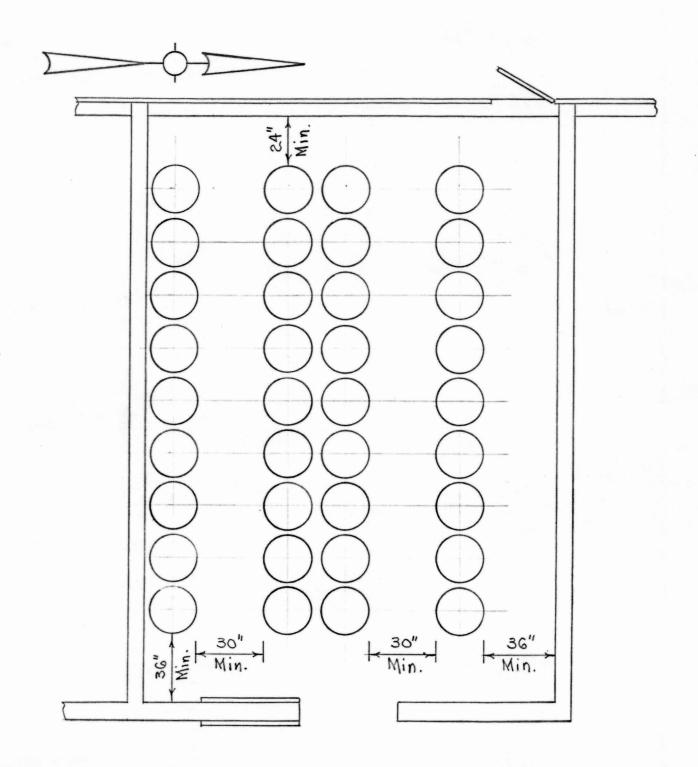


EXHIBIT D

IGNITABLES STORAGE AREA



OPERATING RECORD

VOLUME I

SECTION A

MASTER IDENTIFICATION FILE

OPERATING RECORD

VOLUME I

SECTION B

MASTER WASTE PRODUCT RECORD FORM

GE CODE	D.O.T. SHIPPING NAME	G.E. WASTE DESCRIPTION	D.O.T. ID. NO.		D.O.T. LABEL
13-00	Hazardous Waste, Liquid, N.O.S.			1000	
13-01	Waste Poison B, Solid, N.O.S.	Lab Fungicide Waste	NA9189	None	None
13-02	Waste Solvents, N.O.S.	Clarifier Sludge	NA2811	D008	Poison
13 02	nusce sorvenes, N.O.S.	Waste From Solvent Pool	NA1993	F001-	Flammable
13-03	Waste Phosphoric Acid (RQ-5000)	Oakite 31-33%	UN1805	F005	Commondana
13-04	Waste Phosphoric Acid (RQ-5000)	Phosphoric Acid	UN1805	D002 D002	Corrosive
13-05	Waste Acid, Liquid, N.O.S.	Actane 82	NA1760	D002	Corrosive
3-06	Waste Sulfuric Acid, Spent (RQ-1000)		UN1832	D002	Corrosive
13-07	Waste Ammonium Bifluoride Solution (RQ-5000)	Copper Plating Solution Metex G-2	UN2817	D002	Corrosive Corrosive
13-08	Waste Nitric Acid, 60% (RQ-1000)	Nitric Acid	UN2031	D002	Oxidizer,
13-09	Waste Hydrochloric Acid Solution (RQ-5000)	Hydrochloric Acid	UN1789	D002	Corresive
13-10	Waste Ferric Chloride Solution (RQ-1000)	Ferric Chloride Etchant	UN2582	D002	Corrosive
13-11	Waste Hydrochloric Acid Solution (RQ-5000)			D002	Corrosive
13-12	Waste Sulfuric Acid, Spent (RQ-1000)	Sulfuric Acid	UN1832	D002	Corrosive
13-13	Waste Phosphoric Acid Solution (RQ-5000)	Oakite FH	UN1805	D002	Corrosive
13-14	(Waste Sulfuric Acid, Spent 57% (RQ-1000)	(Bright Dip Acid	(UN1832	D002	Corrosive
	(Waste Nitric Acid 20% (PO_1000)	(Bright Dip Acid	(NA1760	D002	Corrosive
13-15	Waste Chromic Acid Solution (RO-1000)	Alkalume 1744	UN1755	D002	Corrosive
13-16	Waste Chromic Acid Solution (RQ-1000)	Irridite 60% Chromic Acid	UN1755	D002	Corrosive
13-17	Waste Chromic Acid Solution (RQ-1000) Waste Chromic Acid Solution (RQ-1000) Waste Chromic Acid Solution (RQ-1000) Waste Nitric Acid, 65% (RQ-1000) Waste Fluoboric Acid Waste Acid, Liquid, N.O.S. (Waste Fluoboric Acid, 64%	Shipley Catalyst 9F Sulfuric Acid Oakite FH (Bright Dip Acid (Bright Dip Acid Alkalume 1744 Irridite 60% Chromic Acid Actane 70 Eluphoric Acid	UN2031	D002	Oxidizer,
13-18	Waste Fluoboric Acid	Fluoboric Acid	UN1775	D002	Corrosive
13-19	Waste Acid, Liquid, N.O.S.	Shipley Accelerator 19	NA1760	D002	Corrosive
13-20	(Waste Fluoboric Acid, 64%	(Solder Plating Sol.	(UN1775	D002	Corrosive
1 1	(Waste Lead Fluoborate, 3% (RQ-5000)	Fluoboric Acid Shipley Accelerator 19 (Solder Plating Sol. (Solder Plating Sol. Oakite 31 50% E-Lab Acid Wastes Oakite 90 Al-Chelate Shipley Conditioner 1160 Stauffer Cleaner 600 Alkalume	(NA2291	None	None
13-21	Waste Phosphoric Acid Solution (RQ-5000)	Oakite 31 50%	UN1805	D002	Corrosive
13-22	Waste Acid, Liquid Mixture, N.O.S.	E-Lab Acid Wastes	NA1760	D002	Corrosive
13-23		Oakite 90	NA1719	D002	Corrosive
13-24	Waste Sodium Hydroxide Solution (RQ-1000)	Al-Chelate	UN1824	D002	Corrosive
13-25		Shipley Conditioner 1160	UN1219	D001	Flammable
13-26	Waste Alkaline, Liquid Solution, N.O.S.	Stauffer Cleaner 600	NA1719	D002	Corrosive
13-27	Waste Alkaline, Liquid Solution, N.O.S.	Alkalume	NA1719	D002	Corrosive
13-28	Waste Alkaline, Liquid Solution, N.O.S.	Houghto-Clean 3501	NA1719	D002	Corrosive
13-29	Waste 1,1,1 Trichloroethane	1,1,1 Trichloroethane	UN2831	U226	None
13-30	Waste Trichloroethylene (RQ-1000)	Trichloroethylene	UN1710	U228	None
13-31	Waste Methylene Chloride Solution	Freon	UN1593	U080	None
13-32	Waste Perchloroethylene	Perchloroethylene	UN1897	U210	None
13-33	Waste Methylene Chloride	Methylene Chloride	UN1593	U080	None
13-34	Waste Solvent Mixture, N.O.S.	Mixed Chlorinated Solvents	NA1993	None	Combustible

			THE TENTI TENTION TILE			10.00
	GE CODE	D.O.T. SHIPPING NAME	G.E. WASTE DESCRIPTION	D.O.T. ID. NO.		D.O.T. LABEL
	13-35	Waste Solvent Mixture, N.O.S.	E-Lab Solvents, Halogenated	NA1993	F001, F003, F005	Combustib1
	13-36	Waste Solvent Mixture, N.O.S.	Flammable Solvents	NA1993	F003, F005	Flammable
5	13-37 13-38	Waste Isopropanol Solution Waste Solvent Mixture, N.O.S.	Epoxy Resin & IPA Waste Lacquer	UN1219 NA1993	D001 F003,	Flammable Flammable
	13-39	Waste Solvent Mixture, N.O.S.	Flammable Solvents	NA1993	F005 F003,	Flammable
	13-40	Waste Solvent Mixture, N.O.S.	Paint Thinner -GE1500	NA1993	F005 F003, F005	Flammable
	13-41	Waste Solvent Mixture, N.O.S.	Aromatic Solvents	NA1993	F003, F005	Flammable
	13-42	Waste Solvent Mixture, N.O.S.	Paint Thinner-1500/1514	NA1993	F005	Flammable
	13-43 13-44 13-45 13-46 13-47 13-48 13-49 13-50 13-51 13-52 13-53 13-54	Waste Solvent Mixture, N.O.S. Waste Polychlorinated Biphenyls (RQ-10) Waste Petroleum Oil, N.O.S. Waste Oil, N.O.S. Waste Peanut Oil, NH. Waste Petroleum Oil, N.O.S. Waste Oil, N.O.S. Waste Paint Waste Arsenic, Solid Waste Oil Solution, N.O.S. Waste DAG, NH. Waste Solvent Mixture, N.O.S.	IPA-PYROL-ALPHA FLUX 611 PCB Transformer 0i1 Fuel 0i1 & H ₂ 0 Waste 0i1 Peanut 0i1 Lube 0i1 - Compressor 0i1 - Mixed 0i1 Silicone Contaminated 0i1 Silver & Hysol Paint Residue Solid Arsenic Waste Freon, Water, 0il Emulsion Waste DAG Mixed Solvents	NA1993 UN2315 NA1270 NA1270 None NA1270 UN1263 UN1558 NA1270 None NA1993	F005 B001 D001 D001 None D001 None D004 None None F001- F005	Flammable None Flammable Flammable None Flammable None None Poison None None Flammable
	13-60	Waste Poisonous Solid, N.O.S. (Lead) Waste Cyanide Solution, N.O.S. Waste Zinc Peroxide Waste Flammable Liquid, N.O.S. (Waste Lead Dross (Waste Zirconium Metal, Dry (Waste Sodium Hydroxide, Solution (RQ-1000) (Waste Formaldehyde Solution (RQ-1000)	Lead Sludge Cyanide Solution Mixed Oxides Lapping Slurry (Barium & Lead (Zirconium Titanate (Shipley Cuposit 523 (Shipley Cuposit 523	(UN1824	D008 F015 D001 D001 D008 D005 D002 U122	Poison Poison Oxidizer Flammable I Poison Flammable S Corrosive None

		MASTER IDENTIFICATION FILE			100
GE CODE	D.O.T. SHIPPING NAME	G.E. WASTE DESCRIPTION	D.O.T. ID. NO.		D.O.T. LABEL
13-61	Waste Solvent Mixture, N.O.S.	Oakite 96 (Solvent Cleaner)	NA1993	D001	Flammable
13-62	Waste Paint	Spray Booth Residue	UN1263	D001	Flammable
13-63	Waste Paint Mixture	E-Lab Inorganic Chemicals	UN1263	D001	Flammable
13-64	Waste Acid, Liquid Mixture, N.O.S.	Mixed Acids w/dissolved Metals	NA1760	D002	Corrosive
13-65	Waste Sulfuric Acid, Spent (RQ-1000)	Sulfuric Acid	UN1832	D002	Corrosive
13-66	Waste Pyrrolidine Solution	Dilute Aqueous Waste N-Pyrol Rinse	UN1922	P075	Flammable
13-67	Waste Ferric Chloride Solution (RQ-1000)	Ferric Chloride Etch Solution (Dilute)		D002	Corrosive
3-68	Waste Oiled Material	Oil Saturated Absorbent Material	NA9053	None	None
13-69	Waste Potassium Hydroxide Solution (RQ-1000)	Oakite Stripper Q10	UN1814	D002	Corrosive
13-70	(Waste Sulfuric Acid, Spent (RQ-1000)	(Chromic Sulfuric Acid Etch	(UN1832	D002	Corrosive
8380	(Waste Chromic Acid Solution (RQ-1000)	(Chromic Sulfuric Acid Etch	(UN1755	D002	Corrosive
13-71	Waste Cyanide Solution, N.O.S.	Cadmium Plate Solution	NA1588	F007	Poison
13-72	Waste Sodium Chlorite Solution (less than 42%)	Sodium Chlorite Solution	UN1908	D002	Corrosive
13-73	(Waste Methylene Chloride Solution, 50%	(Oakite VIS Strip	(UN1593	D002	
	(Waste Chloroacetic Acid Solution, 25%	(Oakite VIS Strip	(UN1750	D002	Corrosive
13-74	Waste Polychlorinated Biphenyls (RQ-10)	PCB Contaminated Solid Waste	UN2315	B006	None
13-75	Waste Oil, N.O.S.	Waste Roughing Pump 0il	NA1270	D001	None
13-76	Waste Solvent Mixture, N.O.S.	Waste Solvent QC Lab	NA1993	F001-	Flammable I
10 77	Harta Callera Milatana N O O			F005	180
13-77	Waste Solvent Mixture, N.O.S.	Lacquer Wash Waste	NA1993	F003,	Flammable I
13-78	Wasta Wydnofilmonia Asid Calution (DO 5000)	Harden Clarest - A-2 I		F005	
13-78	Waste Hydrofluoric Acid Solution (RQ-5000)	Hydrofluoric Acid	UN1790	U134	Corrosive
13-79	Waste Sodium Chromate (RQ-1000)	Sodium Chromate Bricks	NA9145	None	None
13-81	Waste Corrosive Liquid, N.O.S.	Remover 1112-A	NA1760	D002	Corrosive
13-82	Waste Sodium Chlorite Solution (less than 42%) Waste Corrosive Liquid, N.O.S.	Copper Stripping Solution	UN1908	D002	Corrosive
13-83	Waste Solvent Mixture, N.O.S.	Ammonium Persulphate	NA1760	D002	Corrosive
13-03	waste solvent mixture, N.O.S.	Floor Dry w/Flam. Solvents	NA1993	F001-	Flammable I
13-84	Waste Lead Dross	Frit Waste	NA1794	F005	News
13-85	Waste Polychlorinated Biphenyls (RQ-10)	Empty Drums Contaminated with PCB's	UN2315	D008 B009	None None
13-86	Waste Hydrogen Peroxide Solution (over 52%)	Hydrogen Peroxide	UN2015	U096	Oxidizer, (
13-87	Waste Hydrogen Peroxide Solution (8% - 40%)	Floor Dry w/Hydrogen Peroxide	UN2014	U096	Oxidizer, (
13-88	Waste Hydrofluoric Acid Solution (RQ-5000)	Powdered Lime w/Hydrofluoric Acid	UN1790	U134	Corrosive
13-89	Waste Asbestos	Asbestos Pipe Insulating Powder	None	U013	None
13-90	Waste Acid Sludge	Acid Sludge From Pipes & Trenches	UN1906	D002	Corrosive
	▼	In Sewer System	-111200	2002	331133116
					150

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	GE CODE	D.O.T. SHIPPING NAME	G.E. WASTE DESCRIPTION	D.O.T. ID. NO.		D.O.T. LABEL
	13-91	Waste 1,1,1 Trichloroethane and Lubricating Grease	Lubricating Grease & 1,1,1	UN2831	U226	None
	13-92	Waste Sodium Hydroxide, Dry Granular	Trichloroethane Waste Sodium Hydroxide	UN1823	D002	Corrosive
	13-93	Waste Nickel Chloride Solution (RQ-5,000)	Nickel Plating Solution	NA9139	F006	None
	13-94	Waste Sodium Hydrogen Sulfate Solution	Shipley Cataprep 404 Solution	UN2837	D002	Corrosive
	13-95	(Waste Sodium Hydrogen Sulfate Solution	Shipley Cataposit 44	(UN2837	D002	Corrosive
1		(Waste Hydrochloric Acid Solution (RQ-5,000)		(UN1789	D002	Corrosive
1	.3-96	Waste Dieldrin Solution (RQ-1)	Dieldrin 18E	NA2761	P037	None
	13-97	(Waste Sulfuric Acid, Spent (RO-1,000)	Floor Dry with Misc. Acids	(UN1832	D002	Corrosive
	30.00	(Waste Potassium Dichromate (RQ-1,000) Waste Acetic Acid Solution (RQ-1,000)			D007	None
	13-98	Waste Acetic Acid Solution (RQ-1,000)	Mixed Organic Acids	UN2790		Corrosive
	13-99	Waste Alkaline, Liquid Solution, N.O.S.	Alkastrip 99A	NA1719	D002	Corrosive
	13-100	See Listed Inventory	Lab Disposal Wastes	N/A	N/A	None
	13-102	Waste 20% 2,4-D	2,4 D	NA2765	D016	None
	13-103	Waste Water Wash Paint Sludge	Water Wash Paint Sludge	None	None	None
	13-104	(Charcoal, Wood Granulated	Activated Charcoal With	NA1361	D001	Flammable
		(Trichloroethylene (RQ-1000)	Trichloroethylene	UN1710	U228	None
	13-105	Waste Poisonous Solid, N.O.S. (Lead)	Silicone Molding Compound	NA2811	D008	Poison
	13-106	Waste Poisonous Solid, N.O.S.	Sludge from TPO WWTP	(NA1794		Poison
		(Lead, Barium, Cadmium)	J	(UN2008		Flammable :
				(NA2570		None
	13-107	(Waste Nitric Acid Solution (RQ-1000)	White Etch With Arsenic	(UN2031		Oxidizer
1		(Waste Hydrofluoric Acid Solution (RQ-5000)		(UN1790		Corrosive
1	1	(Waste Arsenic Acid Solution		(UN1553		Poison
	13-108	Waste Polychlorinated Biphenyls (RQ-10)	PCB Capacitors (Max 400#/Dr.)	(UN2315		None
	13-110	Waste Polychlorinated Biphenyls (RQ-10)	PCB Capacitors (Max 750#/Dr.)	UN2315		None
	13-111	Waste Polychlorinated Biphenyls (RO-10)	PCB Capacitors (Max 428#/Dr.)	UN2315		None
	13-112	Waste Corrosive Liquid, N.O.S.	Oakite LNC	UN1760		Corrosive
		Turco Fluro-Check Rinse Water	Turco Fluro-Check Rinse Water		None	None
	13-114		Nickel Sulfamate Plating Solution		None	None
		Waste Dioxane	1,4 Dioxane	UN1165	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Flammable L
			-, - , - , - , - , - , - , - , - , - ,	311103	0100	Tallinable L
						100

NOTE: GE Code No.'s (13-14 (13-20 (13-59 (13-60 (13-70 (13-73 (13-95 (13-97 These GE Waste Descriptions each have a composition of two DOT shipping names, therefore, list both DOT names, DOT ID No labels and hazard codes unless they are the same.